

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

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Gregory Ashley Moyer,

Plaintiff,

v.

Shon Jackson and Koch Industries,  
Inc.,

Defendants.

Case No.: 0:23-cv-00138-JWB-LIB

**DEFENDANTS' MOTION FOR  
MISCELLANEOUS RELIEF**

Pursuant to this Court's inherent authority, and in response to series of vile and hostile communications that Plaintiff, *pro se*, has sent to Defendants' counsel, Defendants Shon Jackson and Koch Industries, Inc. hereby move this Court for an order: (1) prohibiting Plaintiff from sending additional vile, hostile, or threatening communications to Defendants' counsel; (2) requiring Plaintiff to show cause as to why appropriate sanctions should not be imposed as a consequence of this conduct; and (3) appointing an attorney to represent Plaintiff, and through whom any and all communications from Plaintiff to the Court, Defendants, or Defendants' counsel must be filtered.<sup>1</sup> Given the nature of Plaintiff's conduct and escalating behavior, Defendants also request that the Court consider shortening the time for responsive briefing and to resolve this matter on the papers at the Court's earliest convenience. This Motion is based on all

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<sup>1</sup> Defendants reserve all rights, including, but not limited to, defenses and objections as to personal jurisdiction, and the filing of this motion is subject to, and without waiver of, any such defenses and objections.

the files, records, and proceedings herein, as well as the memorandum of law and supporting documents filed herewith.

Dated: May 22, 2023

*/s/ Todd A. Noteboom*

Todd A. Noteboom (#240047)  
Tracey Holmes Donesky (#0302727)  
Andrew P. Leiendecker (#0399107)  
STINSON LLP  
50 South Sixth Street, Suite 2600  
Minneapolis, MN 55402  
(612) 335-1500  
[todd.noteboom@stinson.com](mailto:todd.noteboom@stinson.com)  
[tracey.donesky@stinson.com](mailto:tracey.donesky@stinson.com)  
[andrew.leiendecker@stinson.com](mailto:andrew.leiendecker@stinson.com)

*Attorneys for Defendants*